

# **EXHIBIT B**

DRAFT – MAR. 14, 2024

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiffs,

v.

TERRAFORM LABS, PTE. LTD. and DO  
HYEONG KWON,

Defendants.

Case No. 1:23-cv-01346 (JSR)

**STIPULATION REGARDING WITNESS WILLIAM DISOMMA’S INVOCATION OF  
HIS RIGHTS UNDER THE FIFTH AMENDMENT TO THE UNITED STATES  
CONSTITUTION**

1. William DiSomma is a principal of Jump Crypto Holdings LLC, which was formed in 2018 (at which time it was called 1Hold1 LLC) and serves as a holding company whose foreign subsidiaries, including Tai Mo Shan Limited, focus on trading and investing in the cryptocurrency markets.

2. Mr. DiSomma graduated from the University of Illinois at Urbana-Champaign in 1986, with a degree in finance. He has spent his entire career in the financial industry.

3. On August 30, 2023, Mr. DiSomma provided deposition testimony as a witness in this case. During his deposition, on the instruction of his attorneys, Mr. DiSomma invoked his rights under the Fifth Amendment to the Constitution of the United States and declined to answer questions posed to him by both counsel for the Plaintiff, the U.S. Securities and Exchange Commission, and counsel for the Defendants, Terraform Labs Pte. Ltd. and Do Hyeong Kwon.

4. Mr. DiSomma’s attorneys have advised the parties that, if Mr. DiSomma were

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called to testify at trial, Mr. DiSomma would again invoke his Fifth Amendment rights and decline to answer questions related to the claims asserted in this case.

Dated: \_\_\_\_\_

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